

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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**MILTON ESPADA, ARTHUR KILL PROPERTIES,  
LLC, and PLAZA BODY SHOP, INC.**

**Case No.: 1:23-cv-6186 (NRM)(JRC)**

**Plaintiffs,**

**REQUEST FOR CERTIFICATE OF  
DEFAULT**

**- against -**

**CITY OF NEW YORK, NEW YORK POLICE  
DEPARTMENT CAPTAIN GLORISEL LEE, NEW  
YORK POLICE DEPARTMENT LIEUTENANT  
MIGUEL ESTEVEZ, NEW YORK POLICE  
DEPARTMENT OFFICER DANIEL CENTER  
(SHIELD NO. 29164), NEW YORK POLICE  
DEPARTMENT OFFICER ROBERT CAMPBELL  
(SHIELD NO. 27428), BREEN BROS. TOWING,  
INC., JOSEPH BREEN, and DEALER DIRECT  
SERVICES, INC.**

**Defendants.**

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Plaintiffs, Milton Espada, Arthur Kill Properties, LLC and Plaza Body Shop (collectively hereinafter the “Plaintiffs”), by and through the undersigned attorneys, Milman Labuda Law Group, PLLC, respectfully request that the Clerk of the Court enter the default of Defendants, City of New York (“City”), New York Police Department Captain Glorisel Lee (“Captain Lee”), New York Police Department Lieutenant Miguel Estevez (“Lieutenant Estevez”), New York Police Department Officer Daniel Center (Shield No. 29164) (“Officer Center”), New York Police Department Officer Robert Campbell (Shield No. 27428) (“Officer Campbell”), and Dealer Direct Services, Inc. (“Dealer Direct”) (collectively “Defaulting Defendants”) pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for failure to plead or otherwise defend or appear, as more particularly set forth in the annexed affirmation of Kyle F. Monaghan, Esq. A Clerk’s Certificate is enclosed herewith.

Dated: Lake Success, New York  
September 20, 2023

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Kyle F. Monaghan, Esq.

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